



STATE OF DELAWARE

PUBLIC SERVICE COMMISSION
861 SILVER LAKE BLVD.
CANNON BUILDING, SUITE 100
DOVER, DELAWARE 19904

May 31, 2019

Mr. Peter Richards
Richards Energy Group, Inc.
781 South Chiques Road
Manheim, PA 17545

Re: In The Matter of Richards Energy Group, Inc. For A Certificate to Provide Electric Supply Services within the State Of Delaware (Submitted February 15, 2019) - PSC Docket No. 19-0097

Dear Mr. Richards,

The Delaware Public Service Commission ("Commission") is in receipt of the application (the "Application") submitted by Richards Energy Group, Inc. ("Company") for certification to broker electric supply services in Delaware. **The Application is incomplete as filed due to the failure to submit the required documentation as requested.** This is the final attempt to rectify the Application's deficiency. IF THIS APPLICATION REMAINS DEFICIENT AS OF JUNE 15, 2019, THE DOCKET WILL CLOSE AND THE FILING FEE WILL BE FORFEIT. PLEASE SUBMIT THE FOLLOWING ON OR BEFORE JUNE 15, 2019:

Section 2.2.19 Retail Experience

- Please provide **complete professional résumés for Frank Richards, Peter Richards, and Tara Norby complete with years of service, duties performed for each position held, and the years each person became certified as an Energy Procurement Professional.**

Section 2.5 Verification of Application

- Please provide a signed, sworn statement of verification for each subsequent filing in this docket.

The Company may request that the Commission provide confidential treatment to some or all of the information contained in a document. When requesting confidential treatment for documents filed with the Commission, please simultaneously file a redacted, public version of the same document and an attestation that the information is not subject to inspection or disclosure to the public.

Staff respectfully requests a response to this notice of deficiency on or before June 15, 2019. **Please note that 26 Del. Admin. C. § 3001 (the "Supplier Rules") section 2.4 provides that incomplete applications will be closed four (4) months after the filing date. If the application is not completed within the four (4) month time frame the applicant forfeits their application filing fee and must resubmit the application with an additional filing fee.** The responses and verifications can be uploaded as a subsequent filing in DelaFile under Docket No 19-0097.

Should you have any questions or if I can be of any assistance you may contact me at (302) 736-7539 or send questions by email to Clishona.Marshall@delaware.gov.

Sincerely,

Shona Marshall
Shona Marshall
Public Utility Analyst

CC: Ms. Donna Nickerson, Commission Secretary

Frank J. Richards, PE, CEP

1325 Crown Vetch Drive Landisville, PA 17538 717-898-6330 frichards@richardsenergy.com

Respected Energy Executive who owned and operated a large energy consulting firm since 1995 who has advised large industrial and commercial firms in central-eastern Pennsylvania.

Qualifications/Licenses:

- BS Electrical Engineering, Lehigh University, 1968
- Registered Professional Engineer in PA (since 1974) and Hawaii (since 1997)
- Certified Energy Procurement Professional (CEP) Since 1998
- Licensed Electricity Supplier, PA (since 1999)
- Licensed Electricity Supplier, MD (since 2005)

Active Professional Associations:

- Institute of Electrical and Electronics Engineers (IEEE)
- National Society of Professional Engineers (NSPE)
- PA Society of Professional Engineers (PSPE)
- Association of Energy Engineers (AEE)
- Association for Facilities Engineers (AFE)
- Association of Builders and Contractors (ABC)

Experience:

CEO

2014 - Present

Richards Energy Group

- Provide inspired leadership company wide
- Make high-level decisions about policy and strategy
- Act as the primary spokesperson for the company
- Develop the company's culture and overall company vision
- Create an environment that promotes great performance and positive morale.
- Assure all legal and regulatory documents are filed and monitor compliance with laws and regulations.
- Work with the executive board to determine values and mission, and plan for short and long term goals.
- Identify and address problems and opportunities for the company.
- Build alliances and partnerships with other organizations.

President

1995 - 2014

Richards Energy Group

- Founder of Richards Energy Group
- Provided strategic leadership
- Organized and executed purchasing strategies for large commercial and industrial clients
- Grew business to include divisions that support strategic energy initiative for clients including Lighting Retrofits, PJM Demand Response Programs, Sales Tax Audits, Energy Audits and Energy Consulting
- Performed walk-through energy audits to large industrial and commercial firms
- Performed in-depth process studies of alternative technologies, including analysis of capital, operating and maintenance costs.
- Analyzed electrical distribution, transmission, network analysis, voltage profiling, contingency analysis, 2 to 5 year planning studies and quality control testing and evaluation for large industrial and commercial clients

Frank J. Richards, PE, CEP

1325 Crown Vetch Drive Landisville, PA 17538 717-898-6330 frichards@richardsenergy.com

Engineer, Project Engineer, Sr. Power Engineer

1970 – 1995 *PA Power & Light Co. (PPL)*

- Point of contact for very large PPL electric consumers, providing rate analysis, evaluating electric vs. non-electric alternatives, and providing customer service
- Planned for new utility lines and substations needed in the future, including evaluation of cost-effective alternatives
- Determined whether transmission lines could be taken out for maintenance or emergencies and the corresponding effect on other lines in the network

Quality Control Engineer

1968– 1970 *Eastman Kodak Co.*

Leadership Approach:

Frank's "win-win" approach to marketing and service to customers has resulted in national, regional and corporate recognition. He has presented several papers on energy issues at the World Energy Engineering Congress in Atlanta, Austin and Washington DC, the Competitive Energy Congress in Boston and West Coast Energy Management Congress in Anaheim, all sponsored by the Association of Energy Engineers; the Industrial Energy Technology Conference in Houston sponsored by Texas A&M University; and the National Facility Management & Technology conference in Baltimore, MD. Over the years, kudos have included a national second-place award from the Edison Electric Institute Marketing Achievement Competition, state-wide first-place and honorable-mention awards from the Pennsylvania Electric Association Industrial and Commercial Competition, and company-wide first-place award from the Pennsylvania Power & Light Marketing Recognition Competition. Frank has coordinated and taught several 10 week, Power Distribution Courses, both while working at PPL and REG, has chaired several sessions of the World Energy Engineering Congress (WEEC), and has served several years on the planning board for the WEEC

Peter F. Richards

Mission	Energy Executive passionate about leading a team of energy professionals and delighting customers	
Education	<ul style="list-style-type: none">York College of Pennsylvania; (146 Credits Completed) Bachelor of Science in Mechanical Engineering; Graduated May 12, 2001Wilkes University, Wilkes-Barre, PA (32 Credits)Fundamentals in Engineering Exam for the National Society of Professional Engineers (Formerly EIT)	G.P.A. 3.26
Certifications	<ul style="list-style-type: none">Association of Energy Engineers<ul style="list-style-type: none">Certified Demand Side Manager (CDSM) 1627 12/2013Certified Energy Manager (CEM) 10700 5/2004Business Energy Profesional (BEP) #464 8/2005Certified Sustainable Development Profesional (CSDP) #698 8/2007Certified Energy Auditor (CEA) #468 5/2004Commonwealth of Pennsylvania<ul style="list-style-type: none">Engineer in Training (EIT) – ET005209 5/2001	
Skills	<ul style="list-style-type: none">Executive LeadershipEnergy AuditsSales Tax AuditsRate AnalysisPower Purchasing Electricity and Natural GasCustomer Service EscalationsKey Account Management	
Employment	<div><div><i>Richards Energy Group, Inc</i></div><div><i>President, Chief Technical Officer, Chief Visionary Officer</i></div><div><i>September 2014 – Present</i></div><ul style="list-style-type: none">Ensure best interests of company and enforce core values in all decisionsOversee budgets, staff and other executives in the organization.Work with Executive Team to plan and implement short-, mid- and long-term strategy for the company.Assess the direction of the company and ensure it is in line with the company's stated mission.Act as a visionary and provide leadership for the companyOversee the complete operation of the company ensuring it operates and goals are met based on the direction established in the strategic plans.Acts as the face of the company when dealing with state and local governments and the local community.</div> <div><div><i>Richards Energy Group, Inc</i></div><div><i>Vice President, Chief Technical Officer, Chief Visionary Officer</i></div><div><i>August 2012 – September 2014</i></div><ul style="list-style-type: none">Evaluate and determine products and vendors that are good fits for customersDeterminite technical requirements and needs of staff and customersAssist president in daily duties</div> <div><div><i>Richards Energy Group, Inc</i></div><div><i>Energy Engineer/Senior Energy Engineer</i></div><div><i>March 2003 – August 2012</i></div><ul style="list-style-type: none">Performing Walkthrough Energy and Sales Tax Audits for a variety of commercial, industrial, and institutional facilities throughout PennsylvaniaCalculating and Submitting documentation to the State of Pennsylvania to justify sales tax exemptions on energy usage for manufacturing processesAnalyzing existing building systems and performing comparative analysis costs associated with purchasing and installing more modern and efficient systems and calculating ROI and paybackApplication Engineering for real-time energy monitoring systems to enable Demand Side Management and participation in Demand Side Response programs throughout the PJM interconnect</div>	

- Designed and Implemented turnkey energy efficient lighting retrofit program to enable company to perform free lighting audits and analysis for existing customers
- Assisting in technical management of family owned small business

RV Industries, Inc

October 2001 – February 2003

Engineering Designer / Draftsman

- Designed and Detailed ASME code vessels, paper manufacturing machine components, coal nozzles and low NOx retrofits for coal power plants, and other custom fabricated equipment
- Worked directly with fabrication team to ensure manufacturability of components
- Calculated strength of materials for a variety of equipment and materials to ensure product longevity
- Analyzed bill of material process to assist in migration of database platforms

**Cooperative
Education
Experiences**

Cooperative Education Experience III

August 1999 – January 2000

Harley-Davidson Motor Company – Parts & Accessories

- Updated P&A documentation for ISO 9001 compliance
- Assisted in the start-up of Softail frame production
- Introduced tapered wheel bearings into P&A production
- Developed process plans for non-current parts

Cooperative Education Experience II

January – August 1999

Harley-Davidson Motor Company – Frame Shop

Provided engineering support in changing the Softail frame line from manually welded to a robotic weld line, which required major changes to the Richards-Wilcox power-and-free weld transport conveyor through four phases of change. Additional accomplishments:

- Verified existing conveyor layout and routing
- Updated AutoCAD drawings
- Led weekly meetings to update maintenance teams and engineers
- Coordinated day-to-day work of maintenance teams and contractors
- Designed racks and created material layout for weld cell
- Relocated Softail weld fixtures
- Coordinated line removal in conjunction with conveyor modification
- Followed project throughout remaining three phases while employed part-time during school semester

Cooperative Education Experience I

May – August 1998

Harley-Davidson Motor Company – Assembly Department

Worked as a part of a task team made up of both union and salaried employees to move the Wheel Area, facilitating reorganization of plant. Additional accomplishments:

- Modified AutoCAD layout on daily basis to meet the needs determined during meetings
- Designed carts and racking for new layout
- Worked with task team to find better solutions for wheel transportation, product flow, and limiting WIP

**Additional
Experiences**

Central Sub-Assembly Part-Time Employment

March 2000 – February 2001

Harley-Davidson Motor Company – Assembly Department

- Designed carts and shop layout according to needs of central sub-assembly employees
- Created ISO Compliant work instructions and visual aids to include processes for all parts assembled in central sub-assembly
- Assisted in coordination of phase I & II moves of all necessary equipment to facilitate production
- Worked with team to determine assemblies that were central-subassembly compatible

Consultant for The Richards' Energy Group, Landisville, PA

Summer 1995 – February 2003

- Created process flow diagrams used to file petitions for Pennsylvania state sales tax refunds for industrial clients
- Set up and configured PC's, software, and solved various PC problems

Assistant Manager/Sales Representative

June 1996 – December 1997

Vector Marketing, Lancaster, PA

- Helped representatives solve problems through one-on-one management
- Coordinated District Manager's tasks in his absence
- Implemented an advertising campaign
- Motivated representatives through leadership

- Assisted in recruiting and training a sales force
- Personally sold over \$12,000 in Cutco Cutlery and Cookware products through demonstration and professional presentation of products
- Assisted customers in purchasing decisions

CADD Lab Attendant, Wilkes University, Wilkes-Barre PA

Spring Semester 1997

- Assisted Instructor in grading homework assignments
- Assisted students needing help with CADkey 7.0

Awards

Rene S. Gallager Memorial Award – York College of PA	2000-2001
Final Four in 2000 USFIRST Philadelphia Alliance Robotics Competition	March 2000
First Place – Physical Sciences – York College Scholarship Day	April 2000
Honors Scoop – York College Service Award – Phi Sigma Pi	1998, 2000
First Place – Engineering Dynamics Trebuchet Competition	Spring 1999
Mr. YCP (Mr. York College of Pennsylvania)	1998
Eagle Scout, Boy Scouts of America	October 1995
Presidents Club, Outstanding Sales Leadership, Vector Marketing	July 1996
2 nd Place Bridge Building Competition, sponsored by Penn State York and PA Society of P.E. (PSPE)	Winter 1996
2 nd Place Wilkes University Team Bridge Building Competition	Winter 1997
Engineering scholarship, York College of Pennsylvania	1997-1999
Presidential & Carpenter Scholarship, Wilkes University	1996-1997
Best Section Leader Award, Hempfield High School Marching Band	1995-1996

York County Community Foundation

Leadership

York County Community Foundation

Sustainable Energy Committee

July 2016-Present

- Ensure mission of fund to ensure efficiency and sustainability are kickstarted in the non-profit community
- Energy technical resource for the committee

Lincoln Intermediate Unit 12

York County Innovation Lab Advisory Council

February 2017-Present

- Work with teachers, administrators and advisors to find new and innovative ways to teach and encourage learning in all county schools
- Participate in Design Thinking seminars and courses

Phi Sigma Pi National Honors Fraternity

Initiate Advisor

Spring 2000

- Acted as a liaison between initiate class and brotherhood
- Taught initiates history and ideals of the fraternity through lesson plans, games and weekly quizzes
- Recruited prospective brothers

Funds Committee Chairman

Fall 1997 – Fall 1999

- Planned, coordinated and executed fund raisers to raise money for fraternity sponsored events
- Raised funds to bring fraternity out of debt

York College Peer Advising

Peer Advisor

Spring 1998 – Spring 2001

- Ran orientation events
- Acted as a counselor to incoming freshmen students

Peer Advising Committee

Spring 1999 – Spring 2001

- Trained peer advisors to be proficient in helping the freshmen in their groups with any social, academic and emotional problems they may encounter in their beginning semesters at college
- Planned and executed orientation events

Other Leadership Experience

- Boy Scouts Of America: Chapter Scribe for Order of the Arrow, Senior Patrol Leader, Patrol Leader, Assistant Patrol Leader, Treasurer, and Troop Scribe
- Hempfield High School Bands: Pep Band Director, Sax Ensemble Director, Section Leader, and Equipment Manager

Tara Nordby

10 N Market Street Unit 208 • Lancaster, Pennsylvania 17603 • 717-917-4203 • tnordby@richardsenergy.com

Energy Executive passionate about leading a team of energy professionals and delighting customers

Skills

- Electricity Procurement
- Contract Negotiation
- Supplier Relations
- Partner Relations
- Risk Management
- Project Management
- Account Management
- Customer Service
- Purchasing/RFP Management
- Market Analysis

Education

1995 - 2000 York College B.S. Mechanical Engineering, York, PA

- Bachelor's Degree
- Minor: Mathematics

Certifications

- Certified Energy Procurement Professional: 2016
- EIT: 2000

Work Experience

Vice President, Operations and COO

9/2014 – present Richards Energy Group, Inc., Manheim, PA

- Senior Executive serving as integrator between President of Richards Energy Group and Executive Management Team
- Oversee daily operations of the company and work of executives, including Procurement, Lighting, Demand Response and General Energy Consulting.
- Design and implement business strategies, plans and procedures
- Identify and implement new streams of revenue consistent with company core values and goals.
- Determine and evaluate company key metrics
- Write and submit reports to the CEO and President

General Manager

6/2011 – 9/2014 Richards Energy Group, Inc., Manheim, PA

- Oversee daily business operations
- Create and manage budgets
- Manage staff
- Improve and manage revenue and expenses
- Communicate business goals to the organization

Tara Nordby

10 N Market Street Unit 208 • Lancaster, Pennsylvania 17603 • 717-917-4203 • tnordby@richardsenergy.com

Project Manager

1/2008 – 6/2011 AllscriptsMisys, Raleigh, NC

- Managed multiple client implementations of the Allscripts Homecare Solutions including hardware, software, interfaces, conversions and training.
- Developed client implementation/project plans to align with company goals and assure successful deployment of Allscripts Homecare application.
- Directed the day to day activities of Allscripts Staff present at a client's site.
- Managed client expectations, provided issue escalation pathways and identified/managed client issues.
- Provided general business recommendations to clients with respect to timeline planning, business workflows, software add-ons, interfaces and conversions.
- Acted as primary liaison for exchange and distribution of information between the client and Allscripts.

Director of Project Management, Technical Writing and QA

8/2004 – 10/2007 Genesis Systems, Inc., Lewistown, PA

- Directly responsible for the successful development, management and implementation of Web based vital records registration, management and statistics applications which result in a revenue of over six million dollars during the project development phases.
- Allocated and reviewed work of direct reports including company Project Managers, Technical Writers and Quality Assurance personnel.
- Managed internal and external web based systems/application development projects from inception to successful implementation.
- Directed the deliverables of various work streams (requirements, development, testing, training, and support teams).
- Resolved problems by analyzing issues, discerning the most appropriate courses of actions, provided tactical direction and, when necessary, reallocated resources as needed to ensure deadlines were met.
- Worked closely with end users (State Departments of Health, Birthing Facilities, Physicians, Medical Records Organizations and the State Attorney General's Office), business technologists and others to understand and prioritize business goals and information needs; developed system requirements and design specifications; directed efforts to refine conceptual systems design requirements into the technical design .
- Developed project plans including development, test and production plans detailing the objectives, strategies, and expected results.
- Identified key issues and implemented mitigation strategies to address impact to project schedules.
- Authored and reviewed project proposals (determined goals, time frames, funding limitations, procedures for accomplishing project, staffing requirements and allocation of resources).
- Travel 50%

Project Manager and Director of Technical Writing and QA

12/2002 – 8/2004 Genesis Systems, Inc., Lewistown, PA

- Allocated and reviewed work of direct reports including Technical Writers, and Quality Assurance personnel.
- Established standards and procedures for project reporting and documentation.
- Managed and supported documentation, testing and training efforts associated with systems development work.
- Managed tasks, scope, resources, issues and risks for customized business application systems development projects.
- Created and maintained all project management deliverables, including the project plan and budget.
- Ensured all project tasks were completed on schedule and within budget.
- Communicated the status of the project throughout the entire organization.

Tara Nordby

10 N Market Street Unit 208 • Lancaster, Pennsylvania 17603 • 717-917-4203 • tnordby@richardsenergy.com

- Travel 50%

Product Engineer

9/2000 - 1/2002 FCI Electronics, Etters, PA

- Responsible for the design of new products and the maintenance of existing ones in order to ensure the company's objectives and technical standards.
- Worked with Marketing to define customer needs in order to meet the customer's expectations.
- Provided design solutions in order to meet the customer's expectations. Supervised the creation and maintenance of product documents to ensure accuracy and consistence with design intent prior to release.
- Scheduled, conducted and documented design reviews (DFMEA and PFMEA) in order to insure product performance to specifications.
- Directed the work of drafters, designers and support personnel in order to help them perform their duties and functions.
- Followed company procedure for new product development (PACE) and maintained records demonstrating compliance.
- Worked in multi cross-functional teams to facilitate DFM (Design for Manufacturability) and attainment of good process capability.
- Provided technical guidance, presentation information and other customer assistance needed by Marketing and Sales to meet business objectives.
- Verified product reliability and design using Six Sigma tools, computer simulated tools, prototype testing and tolerance analysis.
- Created plans, maintained schedules, and managed projects covering new products and design modifications.

Structural Engineer

1/1999 - 12/1999 LSC Design Incorporated, York, PA

- Designed structural elements of low-rise buildings, including: roof joists, joist girders, beams, columns, column base plates, footings and masonry walls consistent with ASD, Allowable Stress Design, and ACI, American Concrete Institute, standards.
- Verified structural design using Enercalc, computer aided engineering software.

Manufacturing Engineer

6/1998 - 9/1998 AMP Incorporated, Harrisburg, PA

- Designed first generation manual tooling to ensure assembly was consistent with product design intent.
- Performed capability analysis and developed process control specifications to ensure quality-manufacturing processes of manual production lines.
- Set-up, including programming, of servo controlled equipment in order to facilitate the rapid manufacturing of product.

Development Engineer

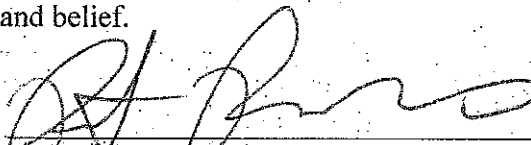
6/1997 - 9/1997 AMP Incorporated, Harrisburg, PA

- Designed surface mount soldering process for BGA and LGA sockets to ensure coplanarity and wicking characteristics were consistent with design intent.
- Conducted fatigue analysis of connector housings and performed non-destructive testing to ensure product complied with customer requirements.


Attachment A
VERIFICATION

STATE OF Pennsylvania)
) SS
COUNTY OF Lancaster)

On this 14 day of June, 2019, personally came before me, the subscriber, a Notary Public in and for the state and county aforesaid, Peter Richards [name of individual who is signing] as the President [authority of individual or title of individual who is signing, e.g., President, Vice President, Sole Member/Manager, Trustee, etc.] of Richards Energy Group, Inc. [name of company or entity that is filing], known to me personally to be such or having presented to me satisfactory evidence of identity, and acknowledged this document to be [his or her] act and deed and the act and deed of such Corporation [type of filer, e.g. corporation, limited liability company, etc.], that the signature of such individual is in [his or her] own proper handwriting, and that the facts set forth in this Application [type of filing, e.g., application, petition, etc.] are true and correct to the best of [his or her] knowledge, information, and belief.


Signature of individual
Printed Name: Peter Richards

SIGNED AND SWORN (OR AFFIRMED) before me on this 14th day of June, 2019, by Peter Richards (name of individual who signed above).


Signature of Notarial Officer

Notary Public
Title (e.g., Notary Public)

My Commission Expires:

April 24th, 2023

SEAL

